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Attorneys for the Creditors, Ravin Skondin and Daniel Franklin.

THE UNITED STATES BANKRUPTCY COURT  
IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

**In re:**

**PG&E CORPORATION,**

**-and-**

**In re:**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the lead case, No.  
19-30088(DM)*

Case Nos. 19-30088 (DM)

Chapter 11

**NOTICE OF ENTRY OF ORDER  
APPROVING STIPULATION  
RESOLVING OBJECTIONS TO  
CONFIRMATION OF DEBTORS' AND  
SHAREHOLDER PROPONENTS' JOINT  
CHAPTER 11 PLAN OF  
REORGANIZATION, DATED MARCH  
16, 2020, FILED BY RAVIN SKONDIN  
AND DANIEL FRANKLIN; AND FOR  
RELIEF FROM THE AUTOMATIC  
STAY**

RELATED DOCKET NOS.: 7295, 7312,  
7335, 7337, 7764, 7986, and 8009

**TO: THE DEBTORS; OTHER PARTIES IN INTEREST; AND THEIR  
RESPECTIVE ATTORNEYS OF RECORD:**

**PLEASE TAKE NOTICE** that on June 18, 2020, the United States Bankruptcy Court for the Northern District of California, entered on the docket an Order Approving Stipulation Resolving Objections To Confirmation Of Debtors' And Shareholder Proponents' Joint Chapter 11 Plan Of Reorganization, Dated March 16, 2020, Filed By Ravin Skondin And Daniel Franklin; And For Relief From The Automatic Stay (hereinafter referred to as the "Order") (Dkt. No. 8009).

**PLEASE TAKE FURTHER NOTICE** that a true and correct copy of the Order is attached hereto and incorporated by reference herein as **Exhibit 1**.

Dated: June 18, 2020

Respectfully submitted,

**PINO & ASSOCIATES**

By: Estela O. Pino, Attorneys for Ravin Skondin  
and Daniel Franklin.

Entered on Docket

June 18, 2020

EDWARD J. EMMONS, CLERK  
U.S. BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA



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**In re:**

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- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the lead case, No.  
19-30088(DM)*

Signed and Filed: June 17, 2020

A handwritten signature in cursive script, reading "Dennis Montali".

**DENNIS MONTALI**  
U.S. Bankruptcy Judge

Case Nos. 19-30088 (DM)

Chapter 11

**ORDER APPROVING STIPULATION  
RESOLVING OBJECTIONS TO  
CONFIRMATION OF DEBTORS' AND  
SHAREHOLDER PROPONENTS' JOINT  
CHAPTER 11 PLAN OF  
REORGANIZATION, DATED MARCH  
16, 2020, FILED BY RAVIN SKONDIN  
AND DANIEL FRANKLIN; AND FOR  
RELIEF FROM THE AUTOMATIC  
STAY**

RELATED DOCKET NOS.: 7295, 7312,  
7335, 7337, 7764, and 7986

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1 This Court having considered the *Stipulation Resolving Objections to Confirmation Of*  
2 *Debtors' And Shareholder Proponents' Joint Chapter 11 Plan Of Reorganization, Dated March*  
3 *16, 2020, Filed By Ravin Skondin And Daniel Franklin; And for Relief From the Automatic Stay*  
4 (the "Stipulation") (Dkt. No. 7986),<sup>1</sup> entered into by and amongst (i) PG&E Corporation  
5 ("HoldCo") and Pacific Gas and Electric Company ("Utility"), as debtors and debtors in  
6 possession (collectively the "Debtors") in the above-captioned chapter 11 cases (the "Chapter 11  
7 Cases"), (ii) creditor Ravin Skondin ("Ms. Skondin"), an individual, and (iii) creditor Daniel  
8 Franklin, an individual ("Mr. Franklin", and collectively with Ms. Skondin, the "Objecting  
9 Parties"); and pursuant to such Stipulation and agreement by and amongst the Debtors and the  
10 Objecting Parties (collectively the "Parties"), and good cause appearing:

11 **IT IS HEREBY ORDERED, ADJUDGED, AND DECREED AS FOLLOWS:**

- 12 1. The Stipulation is approved; and
- 13 2. The Stipulation shall be effective immediately; and
- 14 3. The Skondin Amended HoldCo Proof of Claim shall be deemed the operative  
15 Proof of Claim with respect to claims asserted by Ms. Skondin against HoldCo. The Skondin  
16 Amended Utility Proof of Claim shall be deemed the operative Proof of Claim with respect to  
17 claims asserted by Ms. Skondin against the Utility. The Skondin Amended Proofs of Claim shall  
18 be resolved as provided herein; and
- 19 4. The Franklin Amended Proof of Claim shall be deemed the operative Proof of  
20 Claim with respect to claims asserted by Mr. Franklin against the Debtors, and shall be resolved  
21 as provided herein; and
- 22 5. The Automatic Stay is modified, effective immediately, to allow Ms. Skondin to  
23 have her claims against the Debtors, as set forth in the Skondin Amended Proofs of Claim, heard,  
24 determined, and liquidated by the Superior Court in the Skondin State Court Action, including

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26  
27 <sup>1</sup> Any capitalized terms defined in the Stipulation and not otherwise defined in this Order shall  
28 have the meaning defined in the Stipulation.

1 without limitation the completion of pretrial proceedings, trial, post-trial motions, and any  
2 appellate proceedings in the Skondin State Court Action, but not to permit enforcement of any  
3 judgment, which shall be satisfied under the Plan pursuant to the treatment provided for general  
4 unsecured creditors in the Plan; and

5 6. To the extent the prosecution of the Skondin State Court Action results in a  
6 liquidated settlement or final judgment, the Skondin Amended Utility Proof of Claim and/or the  
7 Skondin Amended HoldCo Proof of Claim shall be allowed against the Utility and/or HoldCo,  
8 respectively, as the case may be, in the amount of any such settlement or judgment, and shall be  
9 paid in full as a general unsecured claim pursuant to the treatment provided for Class 4A and/or  
10 4B of the Plan (provided, however, should both of the Skondin Amended Proofs of Claim be  
11 allowed, Ms. Skondin's recovery must be consistent with the rule against double recovery for the  
12 same tort, *see Carr v. Cove*, 33 Cal. App. 3d 851, 854 (Cal. Ct. App. 1973)); and

13 7. The Automatic Stay is modified, effective immediately, to allow Mr. Franklin to  
14 have his claims against the Debtors, as set forth in the Franklin Amended Proof of Claim, heard,  
15 determined, and liquidated by the Superior Court in the Franklin State Court Action, including  
16 without limitation the completion of pretrial proceedings, trial, post-trial motions, and any  
17 appellate proceedings in the Franklin State Court Action, but not to permit enforcement of any  
18 judgment, which shall be satisfied under the Plan pursuant to the treatment provided for general  
19 unsecured creditors in the Plan; and

20 8. To the extent the prosecution of the Franklin State Court Action results in a  
21 liquidated settlement or final judgment, the Franklin Amended Proof of Claim shall be allowed  
22 against the Utility in the amount of any such settlement or judgment, and shall be paid in full as a  
23 general unsecured claim pursuant to the treatment provided for Class 4B of the Plan; and

24 9. The Stipulation shall survive confirmation of the Plan; the Effective Date of the  
25 Plan; and if the Plan becomes null and void pursuant to Section 9.5 of the Plan; and

26 10. The Objections (Dkt. Nos. 7295, 7312, 7335, and 7337) are deemed withdrawn  
27 and resolved (provided however if the Plan is not confirmed or becomes null and void pursuant  
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1 to Section 9.5 of the Plan and another plan is filed, the Objecting Parties reserve the right to  
2 object to any such plan and disclosure statement pertinent thereto); and

3 11. The Skondin Stay Relief Motion (Dkt. No. 7764) is deemed resolved, and the  
4 hearing regarding the Skondin Stay Relief Motion is vacated; and

5 12. Mr. Franklin shall refrain from filing a motion for relief from the Automatic Stay,  
6 as being unnecessary; and

7 13. Prime Clerk LLC, the court appointed claims and noticing agent in these Chapter  
8 11 Cases, is authorized and directed to update the official claims register in these Chapter 11  
9 Cases to reflect the terms of this Stipulation; and

10 14. This Court retains sole and exclusive jurisdiction to hear and determine any and  
11 all disputes or controversies arising from or related to the implementation, interpretation, or  
12 enforcement of the Stipulation and/or this Order.

13 \* \* \* **END OF ORDER** \* \* \*

14 Approved as to form and content:

15 Dated: June 17, 2020

**KELLER BENVENUTTI KIM LLP**

16  
17 By: /s/ Peter J. Benvenutti  
18 Peter J. Benvenutti, Attorneys  
19 for Debtors and Debtors in Possession

**WEIL, GOTSHAL & MANGES LLP**

20  
21 By: /s/ Mathew Goren  
22 Mathew Goren, Attorneys  
23 for Debtors and Debtors in Possession.

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